UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
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MEMORANDUM

SUBJECT: Comments: draft Work Package I Technical Memorandum: Preliminary Contaminant of Potential Concern Selection

FROM: Philip K. Turner, Ph.D.
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TO: Philip Allen
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cc: Jon Rauscher, Ph.D.
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DATE: March 20, 2007

Comments:

1. **p 2, § 2.1:** It is unclear how data performance and acceptance criteria would be different between selection of COPCs and future risk assessment activities. Since COPC selection is part of a risk assessment process, it seems that if data are suitable for one, then they should be suitable for the other. Please clarify and provide examples.

2. **p 4, § 2.2, last sentence:** See comment # 1.

3. **p 5, § 2.2.1, last ¶, last sentence:** Please explain/justify "generally representative". It is clear that surface water samples were not as extensive, however, it is not as clear that they are representative of the range of conditions at Patrick Bayou. For example, many of the surface water samples were taken just beyond areas where sediments settle out. In such areas, surface water concentrations would be expected to be lower due to binding to settled sediment particles.

4. **p 6, § 3.1, ¶ 1:** Provide source of benchmarks for Dioxins/Furans.

5. **Table 3-1:** For clarity and ease of reference, please provide a column in this table indicating the source of each benchmark.

6. **p 6, § 3.1, ¶ 2, 1st sentence:** The terms, "exposed indefinitely", in this context is not entirely accurate. All NRWQC are based on average exposure scenarios (i.e., average concentration over average time period, with average frequency). As such, no exposure scenario is considered to be indefinite or constant. Please rewrite with this information in mind.

7. **p 9, § 3.2.1, last ¶, 3rd sentence:** "To support refinement of… without benchmarks were compared to sediment quality screening levels…". Sediment Quality Screening Levels, in essence, serve as benchmarks since there are no others available. As such, the consistent concept in this document of "no sediment benchmarks" is confusing and needs clarification.

8. **p 11, § 4.1.2.2, last ¶:** Explain "if necessary". Define and briefly discuss the criteria to be used to in determining if further evaluation (e.g., risk assessments) will be necessary.

9. **Table 4-3:** There is no reference to Table 4-3 in the text. Please provide and discuss where appropriate.

10. **p 13, § 4.2.2.2, ¶ 1, 2nd sentence:** "frequently related to background". The reader does not understand what "related" to background means. Suggest replacing with a more appropriate word. In addition in this section, it should not overlooked that many essential nutrients can also be highly toxic in the aquatic environment. Copper is a perfect example

11. **p 13, § 4.2.2.3:** This section needs clarification/justification. It is very unclear why or how an HQ was calculated for silver if it is to be eliminated as a COPC. HQs are generally not calculated until the risk characterization steps, and only with retained COPCs. As such, an HQ > 1 is not justification for elimination. Detection Frequency < 5% may be.